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April 24, 2017 1:20 PM

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

Larry D. Raper Sr. No:147525

CLERK OF COURT
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY: ns / Scanned: 04/14/2017

(Enter above the full names of all plaintiffs, including prisoner number, in this action.)

v. Lynn M. Larson, Terence Whiteman, Joseph V. Cotronero
entire medical staff at the Duane L. Waters Health Center
As well as the MDOC it self

(Enter above the full name of the defendant or defendants in this action.)

1:17-cv-368

Paul L Maloney - U.S. District Judge
Ray Kent - U.S. Magistrate Judge

COMPLAINT

I. **Previous Lawsuits**

CAUTION: The Prison Litigation Reform Act has resulted in substantial changes in the ability of incarcerated individuals to initiate lawsuits in this and other federal courts without prepayment of the civil action filing fee. Accurate and complete responses are required concerning your litigation history. Generally, a plaintiff's failure to accurately and completely answer the questions set forth below will result in denial of the privilege of proceeding *in forma pauperis* and require you to pay the entire \$400.00 filing fee regardless of whether your complaint is dismissed.

A. Have you ever filed a lawsuit while incarcerated or detained in any prison or jail facility? Yes No

B. If your answer to question A was yes, for each lawsuit you have filed you must answer questions 1 through 5 below. Attach additional sheets as necessary to answer questions 1 through 5 below with regard to each lawsuit.

1. Identify the court in which the lawsuit was filed. If it was a state court, identify the county in which the suit was filed. If the lawsuit was filed in federal court, identify the district within which the lawsuit was filed.
Lenawee County, 39th Circuit I think
2. Is the action still pending? Yes No
a. If your answer was no, state precisely how the action was resolved: The time ran out
in which I had to appeal several decisions.
3. Did you appeal the decision? Yes No
4. Is the appeal still pending? Yes No
a. If not pending, what was the decision on appeal? I had won at several courts
and was scheduled for a trial.
5. Was the previous lawsuit based upon the same or similar facts asserted in this lawsuit? Yes No

If so, explain: _____

II. **Place of Present Confinement** Carson City Correctional Facility.

If the place of present confinement is not the place you were confined when the occurrence that is subject of instant lawsuit arose, also list the place you were confined:

Duane L. Waters Health Center, 3857 Cooper Street, Jackson Mi. 49201

III. Parties

A. Plaintiff(s)

Place your name in the first blank and your present address in the second blank. Provide the same information for any additional plaintiffs. Attach extra sheets as necessary.

Name of Plaintiff Larry D. Raper Sr. No:147525 10274 E. Boyer Road

Address Carson City Correctional Facility, Carson City Michigan 48811

B. Defendant(s)

Complete the information requested below for each defendant in this action, including whether you are suing each defendant in an official and/or personal capacity. If there are more than four defendants, provide the same information for each additional defendant. Attach extra sheets as necessary.

Name of Defendant #1 Joseph V. Cotronero

Position or Title MD

Place of Employment McLaren Hospital, 401 West Greenlawn

Address Lansing Michigan. 48910

Official and/or personal capacity? Surgeon MD

Name of Defendant #2 Lynn M. Larson

Position or Title DO

Place of Employment Duane L. Waters Hospital 3857 Cooper Street

Address Jackson Michigan. 49201

Official and/or personal capacity? DO

Name of Defendant #3 Terence Whiteman

Position or Title MD 21079

Place of Employment Duane L. Waters Hospital. 3857 Cooper Street

Address Jackson Michigan. 49201

Official and/or personal capacity? MD21079 I think he is the lead Doctor at Duane L. Water

Name of Defendant #4 Michigan Department Of Corrections

Position or Title

Place of Employment

Address

Official and/or personal capacity?

Name of Defendant #5

Position or Title

Place of Employment

Address

Official and/or personal capacity?

IV. Statement of Claim

State here the **facts** of your case. Describe how each defendant is personally involved. Include also the names of other persons involved, dates and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets if necessary.

Please refer to the papers pertaining to facts of claim behind this peace of paper.

V. Relief

State briefly and precisely what you want the court to do for you.

Plaintiff request that all Defendants separately and individually award the Plaintiff \$750.000.00 in exemplary damages and \$850.000.00 for compensatory damages, or any money that the Jury would award that will be allowed. Also the MDOC in the amount of five million or more. As the MDOC should be held accountable for the loss of my right leg. As the Doctors for the MDOC have known of the closing down of my arteries for a little over fifteen years or more.

4-19-2017

Date

Sorrey D. Raper Sr.
Signature of Plaintiff

NOTICE TO PLAINTIFF(S)

The failure of a *pro se* litigant to keep the court apprised of an address change may be considered cause for dismissal.

- 1 - MD-Joseph V. Cotroneo McLaren Hospital Grater Lansing. As he is the Surgeon which performed the operation on 4/27/2015 dealing with placing a graft into my right groin to improve blood flow. During the operation, they had quite a few complications. As I guess, I had a blood clot which, popped up after the first operation, or during the operation itself, it was heading toward my heart. Then I guess I had a heart-attack. Which was brought on, is because of the medications in which I have been given over the years, as there has been research done that shows they them-self can lead to another heart-attck. I should have been informed many years ago, and leading up to the operation itself by MD Joseph V. Cotroneo should have checked, and seen what kind of medications I had been taking down over the years.

- 2 - The Doctors, in the Department Of Corrections have known of my problems with my legs closing down for a little over fifteen years, but chose not to do any thing to correct the problem, until I lost my right leg because of their deliberate indifference to my serious medical needs.

- 3 - On 5/4/2015 I was transferred down to Duane L. Waters Medical Facility. I was placed under the care of MD Rashed Bashir. Then on 5/13/2015 or 5/14/2015 I was discharged, and transferred back here to my facility, which is DRF-WEST Carson City Correctional Facility. Between 5/14/2015 & 5/31/2015 I contracted the MRSA virus while being housed here in 800/66/Bottom or in the health care center itself. Any ways on 5/31/2015 I was admitted back to McLaren Hospital, and placed under the care of MD Joseph V. Cotroneo. On 6/2/2015 he operated to remove the MRSA virus.

- 4 - MD Joseph V. Cotroneo had to take, and operate on the infected area to remove the MRSA virus. As after reading his medical report, I wonder why that when he states he removed the MRSA virus all the way down to the graft. Now why would he not have taken the graft out then? As more then likely it was infected with the MRSA virus as well. As it seems to me that if MD Praveen Balraj at the Henry Ford Hospital there in Detroit Michigan, was able to remove the graft, and infection to save my life, why could not MD Joseph V. Cotroneo not have done the same thing? As it should have been clear to him that my body was rejecting the graft. Please refer to exhibit - E - excerpts taken from MD Joseph V. Cotroneo medical files them-self.

- 5 - On 3/13/2017 the Department Of Corrections sent me back to see MD Joseph V. Cotroneo. While I was there he himself said I see that your body was not excepting the graft all that well. Ha should he not have come to that conclusion long time ago, when he had to remove the MRSA virus? Rather then trying to continue to prove that the graft was the right procedure & treatment of my legs. As most times this procedure will not work. As Doctor Terence Whiteman himself told me that there was a inmate there at Duane L. Waters Hospital that had the same procedure done on his leg, and along with a couple of nurses told me that it kept flaring up, and they had to finely remove it.

- 6 - After reading over a lot of the medical records in which I obtained from the health care here at DRF-WEST. I noticed DO Lynn M. Larson was the Doctor of record who was in charge of treating my health problems from roughly 6/15/2015 or 6/16/2015 through roughly 8/3/2015. As that is when PA Danielle S. Alford returned back to work after being off. If that I am off on the dates it is only one day. Any ways PA

Alford would not have known of my bleeding which occurred on roughly 8/3/2015 or 8/4/2015. As I started bleeding around 8:30-Pm. Then they allowed me out to take a shower, to wash the blood off of me.

- 7 - Then the nurses was told to check in on me every hour to make sure I had not started bleeding again. Now here is the question in which I would like to ask. How could the Medical Staff there at Duane L. Waters Medical Center been so incompetent in the handling of my health issues? As see I was scheduled to be discharged on 8/6/2015. Which was the exact day in which I almost bleed to death. So should it not show any one reading this that the entire staff at the Duane L. Waters Medical Facility were inferior with their handling of my health problems. As I sure would have been a dead man, if that I would have gotten on the van that day in which I was to be discharged.

- 8 - After reading Terence Whiteman MD 21079 medical reports exhibits - F -. As after further review of the medical files in which I have obtained, with some of his findings, and comments I realize he is trying his up-most to cover for several of the Doctors there at Duane L. Waters Medical Facility. As he himself is trying to cover for Lynn M. Larson DO. He himself can not take, and cover for MD Joseph V. Cotroneo as he no longer works at the same hospital in which he works at. As see why did himself, as well as the other Doctors, and PA there at Duane L. Waters not have realized there was infection growing under the services of my skin area in my groin. As that is what happened in health treatment while being housed there at Duane L. Waters Health Center.

- 9 - After being discharged from Duane L. Waters Medical Center on roughly 5/13/2015 I was transferred back here to DRF-WEST. Then between 5/13/2015 & 5/28/2015 or 5/31/2015. I contracted the MRSA virus. Then had to be taken back down to McLaren Hospital, to have the MRSA virus removed. So the living conditions in not only 800-Unit also could be said with other units or health care centers through out the state of Michigan.

- 10 - As they have taken the bleach out of the facility's. Any way that is what I have been told, but then I hear other facility's have bleach, I know that here at this facility they do have bleach for the inmates that have dogs to train. Now if this be the case then why is not bleach made available for the other units to use in cleaning their showers, laundry rooms to wash their clothes? So see if that maybe I would not have contracted the MRSA virus I may not have lost my right leg. So the MRSA virus has to be taken into consideration to the loss of my right leg. I realize that paragraph ten is similar to paragraph three, but it is not as I am showing both aspects of the MRSA virus, and the ones that are responsible for me contracting the MRSA virus. As many are responsible.

- 11 - Dealing more in-depth with DO Lynn M. Larson, after further review of the medical records in which I received from Duane L. Waters. I see that she was the Doctor which was in charge of my care from roughly 6/15/2015 until roughly 8/3/2015 or 8/6/2015. The reason in which I place these dates this way, is because during these two and a half months I only saw DO Lynn M. Larson roughly 10 to 18 times during this time. She totally went against the orders placed by MD Joseph V. Cotroneo as she ordered a different kind of

dressing along with the packing which was to go into my open wound, as it was cheaper then what MD Joseph V. Cotroneo ordered for my treatment.

- 12 - As see this in an of it self is a violation of medical health ethics, which in itself makes DO Lynn M. Larson liable for the loss of my right leg. As see the one time she ordered it only to be changed every three days, with the drainage from the open wound, it stunk like a out door toilet. The nurses had to bring it to her attention, then she checked on it, and changed the orders some what, but still it was very poor care on her behalf. And was not up to standards as that in which a person would receive if that they should be in a out side hospital.

-13- The key individuals in which I am going to place at fault for the loss of my right leg is Joseph V. Cotroneo McLaren Hospital, Lynn M Larson DO Duane L. Waters Hospital then if that Terence Whiteman MD 21079 wants to try and cover for Lynn M. Larson DO rather then reveling the nature of her failing to over look the problem which occurred between these dates 6/15/2015 and 8/3/2015, as that is when she was in charge of my medical cares, which Terence Whiteman, MD #21079 6/15/15 wrote up Discharge date 10/22/15. Excerpts taken from Terence Whiteman MD #21079 medical notes. Now one has to take, and deal with the fact that either he will have to take, and revamp his finding, as reading a little on this antibiotics drip in which I was placed on, I can not say what kind of antibiotics is. But one needs to know that after calculating how much I was to be given, and if that was wrong then were does the mistake enter in to the failure lay at either on the McLaren Hospital or Duane L. Waters medical staff?

- 14 - But the main dates in which I would like to look at is as follows. 6/15/2015 through 8/3/2015 or 8/6/2015 as these are a few dates in which I was placed under the care of Lynn M. Larson DO. Now if a person will take, and read each, and every one of her orders on how the wound was to be handled by the nurses, one will notice that she had taken away the wound dressing in which Doctor MD Joseph V. Cotroneo had prescribed. So now if that she chose to be cheaper then the treatment in which I was given while there at McLaren Hospital, then to take, and totally disregard MD. Joseph V. Cotroneo prescribed treatment. The question concerning DO Lynn M. Larson, how can she not be held accountable for her totally not catching that, on roughly 8/3/2015 I had started bleeding roughly around 7:00-Pm or 7:30-Pm , now why was I not taken, and sent out some where to a specialist?

- 15 - To find out what was causing me to bleed? As if you will notice he himself says that I was healing quite nicely, and was going to be discharged just two days later. As I was scheduled to be discharged back here to my facility, and that is the day in which my artery exploded, and I almost bleed to death, that is when MD #21079 Terence Whiteman had to place all of the 80 pounds of weight on the groin area in order to control the bleeding, then we arrived at Allegiance Health ER reads as follows I directed the care throughout the transport and gave report to both ER staff and Dr. Cardon, the vascular surgeon. Then I was transported over to Henry Ford Hospital, in Detroit Michigan, and placed under the care of Praveen Balraj MD. So how is it that Praveen Balraj MD able to remove the graft, and the infection which was growing under the skin. Should not the medical staff there at Duane L. Waters caught it?

- 16 - Now should not the Michigan Department Of Corrections them-self be held responsible for the loss of my right leg. As mentioned earlier the medical doctors for the MDOC have known of the closing of my arteries in my legs for over fifteen years, but chose to totally ignore my serious condition until they caused me to loose my right leg. Then even after the loosing of my right leg the medical department for the state of Michigan still wants to play games with the treating of my prosthetic, an pain. Also their continue practicing of not caring for the pain in which is a on going occurrence with the ones that are in control there in Lansing Michigan. As I have asked Doctor Scott Holmes has requested a air mattress, but for some reason they denied it. Now if that I was ordered one there at Duane L. Waters. And the rehabilitating process in which I was given by Henry Ford Hospital shoes that I should not have a pillow under my dub nor in-between my legs. So that is the reason in which I some times am woke up for a sound sleep when I roll over on to my amputated section of the right leg that is left.

- 17 - The MDOC should be held liable for the loss of my right leg along with cruel, and unusual punishment. There is really now amount of money in which one can place on the loss of a leg, the re-occurring nightmares, and dreams in which I have had about the day in which I almost bleed to death, the re-occurring phantom pain in which I have. The sleepless nights in which I have from time to time from the pain etc. As the MDOC should be held in the amount of five million or more, as if you would make defendants out of each Doctor involved in the MDOC it would add up to more then five million or more. As over the last fifteen years or more the Doctors have known of the closing down of my arteries in my legs. But chose to ignore it. As a inmate in the department of corrections here in the state of Michigan sure is not afforded the kind of care in which a person would be afforded if they were in the free world.

- 18 - Exhibit - A - deals with the first grievance in which I placed against the medical staff there at Duane L. Waters Hospital, then Exhibit - B - deals with the one in which I placed against this facility concerning the MRSA virus. The head fellow there in Lansing Michigan, took and did not return my copies back to me. So that is the reason in which I do not have the information in which I mailed to the mane office there I Lansing Michigan. I only have the response back from that office. Then Exhibit - C - is the grievance in which I took, and filed combining both the MRSA virus along with Doctors Joseph V. Cotroneo, Terence Whiteman, Lynn Larson, and the MDOC. Exhibit - D - are some AFFIDAVIT in which several of the inmates gave me which was there on the floor at Duane L. Waters the day in which I almost bleed to death. Please notice what each one of them had to say concerning me bleeding there that day. Also what all of them had to say concerning DO Lynn Larson.

- 19 - Exhibit - E - is excerpts taken from MD Joseph V. Cotroneo medical files them-self. Exhibit - F - is excerpts taken from Terence Whiteman MD #21079, an Danielle Alford, PA #31075. As both of their medical files reveals quite a bit of information. As both of their medical files revels that after spending a little over two an a half months at Duane L. Waters Medical Health Center, one will notice that MD Praveen Balraj there at the Henry Ford Hospital says in his medical reports that my right groin was still infected. Now how could that be after all of the antibiotics in which they were giving me there at Duane L. Waters? As the fault has to lay with both McLaren Hospital, as well as Duane L. Waters for their wrong antibiotic prescribed treatment.

No:147525

10274 E. Boyer Road
Carson City Correctional Facility
Carson City, Michigan. 48811

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